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Monticello Mill Tailings Superfund Site Monticello, Utah

Interim Community Relations Plan Update

September 1994

MRAP OUIII AR 540 3-4 COMM RELS UPDATE
MONTICELLO MILL TAILINGS SUPERFUND SITE
INTERIM COMMUNITY RELATIONS PLAN UPDATE 9/94

**Monticello Mill Tailings Superfund Site
Monticello, Utah**

Interim Community Relations Plan Update

September 1994

**Prepared for
U.S. Department of Energy
Grand Junction Projects Office
Grand Junction, Colorado**

**Prepared by
RUST Geotech Inc.
Grand Junction Projects Office
Under DOE Contract No. DE-AC04-86ID12584**

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Contents

I.	Introduction	1
II.	Background	2
III.	Stakeholders	3
IV.	Community Concerns Regarding Disposal Alternatives	4
V.	Constraints	6
VI.	Strategy	7
VII.	Communications Objectives	8
VIII.	Communications Activities	8
	Appendix A	16
	Appendix B	18
	Appendix C	20
	Appendix D	21

Interim Community Relations Plan Update for the Monticello Mill Tailings Site

I. Introduction:

The purpose of the community relations program for the Monticello Mill Tailings Site (MMTS) is to provide understandable, accurate, and timely information to interested parties during environmental cleanup activities. The community relations program is also intended to establish two-way communication between the U.S. Department of Energy (DOE) and stakeholders, and provide the opportunity for public involvement in decisions regarding environmental restoration. This includes public involvement in the decision-making process for selecting a disposal alternative, which could result in an Amendment to the 1990 Record of Decision for the MMTS.

This Interim Community Relations Plan (CRP) Update addresses those community relations activities to be conducted from June 1994 through the Amendment to the Record of Decision. The purpose of the Interim CRP is to address issues and concerns and identify communications activities related to the reassessment of disposal alternatives for approximately 2.6 million cubic yards of uranium mill tailings. Alternatives include an on-site disposal option and an off-site option that would require transportation of the tailings on a public highway. The *March 1991 Community Relations Plan for the Monticello Mill Tailings Site* (located in the Information Repository at the Monticello Projects Office on 95 ½ South Main, Monticello, Utah) can be referenced for other information not contained in the Interim CRP. The Interim CRP is based on interviews, discussions, letters received from the public, and comments and questions raised during community involvement meetings. These activities were performed from June 1993 through August 1994. During that time, discussions were held with individuals from the following groups or agencies:

- Monticello Vicinity Property owners
- Local business owners
- Community members
- Monticello Site-Specific Advisory Board members
- San Juan County Commissioners
- Monticello and Blanding officials
- San Juan County Economic Development and Travel Council
- Blanding Chamber of Commerce
- College of Eastern Utah, San Juan Campus
- Local media
- Local environmental groups
- Native Americans
- Federal and State representatives

All community relations activities are conducted in accordance with the following federal environmental laws and DOE and U.S. Environmental Protection Agency guidance.

- 1990 National Oil and Hazardous Substance Pollution Contingency Plan (NCP) § 300.415, § 300.425, § 300.430, § 300.435, § 300.815.
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986. Sections 113; 117(a), (b), (c), (d), (e); 122 (d).

- U.S. Environmental Protection Agency, *Community Relations in Superfund: A Handbook*, January 1992.
- U.S. Department of Energy, *Public Participation in Environmental Restoration Activities Environmental Guidance*, November 1991
- Federal Facilities Environmental Restoration Dialogue Committee, *Interim Report of the Federal Facilities Environmental Restoration Dialogue Committee: Recommendations for Improving the Federal Facilities Environmental Restoration Decision-Making and Priority-Setting Processes*, February 1993

II. Background:

Monticello Mill Tailings Site

This Interim CRP addresses community relations issues, concerns, and activities related to alternatives for disposal of tailings from the Monticello Mill Tailings Site and contaminated materials from peripheral and vicinity properties that are stored on the millsite. The Monticello Mill Tailings Site is divided into 3 Operable Units, which are presented below. Background information on the reassessment of alternatives is presented in the section on "Operable Unit 1 - Millsite and Tailings Piles." The vicinity properties are managed under a separate Record of Decision signed in 1989.

Operable Unit 1 - Millsite and Tailings Piles

Operable Unit (OU) I includes the 78-acre millsite, the tailings impoundment areas, and areas where tailings removed from the peripheral properties and the Monticello vicinity properties are stockpiled. The volume of tailings at OU I will total approximately 2.6 million cubic yards once peripheral and vicinity property cleanup is complete.

The remedial action selected in the 1990 Record of Decision involves excavation of the tailings and disposal in an on-site repository south of the former mill location. Information collected during the design process and preliminary performance assessments indicated the proposed DOE design of the on-site repository would not meet ground-water protection standards. Therefore, DOE, the State of Utah, and the U.S. Environmental Protection Agency are currently considering other disposal options, with the potential for amending the 1990 Record of Decision. These options include disposal of the tailings at the White Mesa Mill Facility south of Blanding, which is licensed by the Nuclear Regulatory Commission (NRC); or disposal of the tailings on site in a repository designed to meet the ground-water protection standards.

Operable Unit II - Peripheral Properties

Peripheral properties include approximately 300 acres of land adjacent to the site and contain approximately 300,000 cubic yards of tailings and other contaminated material. The cleanup remedy for the peripheral properties is removal of the contaminated materials and relocation to the east millsite tailings pile for temporary storage. Ultimate disposal is in the on-site permanent repository described for OU I.

Operable Unit III - Surface and Ground Water

OU III includes cleanup of ground water and surface water contamination and remediation of stream-deposited contaminants in Montezuma Creek Canyon. As specified in the 1990 ROD, a separate ROD will be issued for OU III when sufficient data are available to make a remediation decision.

III. Stakeholders:

The following groups, agencies, and organizations were identified as stakeholders who have an interest in or are affected by the cleanup activities in Monticello. Some stakeholders were identified during community interviews or through the Site Specific Advisory Board; others identified themselves through public meetings, the Toll-Free number to the DOE Grand Junction Projects Office (1-800-269-7145), and letters in response to mailings sent out that detailed the Monticello project and disposal alternatives. Many have been included as stakeholders since the inception of the Monticello projects. Stakeholders include:

- Monticello, Blanding, White Mesa Ute Reservation, Blue Mountain Dine chapter of the Navajo Nation, and Bluff residents.
- Monticello residents near the millsite, peripheral property owners, vicinity property owners, and potential ground-water users.
- General public using the transportation corridor from Monticello to Blanding (e.g. tourist traffic, truckers).
- Communities, residences, and businesses located near or along the proposed transportation corridor.
- Local Media - KUTA radio, San Juan Record, Blue Mountain Panorama, Canyon Echo, Navajo Times.
- Local County Government - San Juan County Commissioners.
- Local City Government - Monticello City Council, Monticello Economic Development and Travel Council, Moab to Monument Valley Film Commission, Monticello Planning Commission, Blanding City Council, Blanding Planning Commission, Blanding Chamber of Commerce.
- Blanding and Monticello Elementary and Secondary Schools - Blanding: Albert R. Lyman Middle School, Blanding Elementary School, San Juan High School; Monticello: Monticello Elementary School and Monticello High School.
- State Organizations - State of Utah Department of Environmental Quality, Southeastern Utah District Health Department, College of Eastern Utah San Juan Campus, Utah Department of Transportation, State of Utah Historic Preservation Office, State of Utah Department of Natural Resources Division of Wildlife Resources.
- Congressional Delegation - U.S. Senators Orrin Hatch and Robert F. Bennett, U.S. Congressman Bill Orton.
- State Representation - Governor Michael O. Leavitt, State Senator Mike Dmitrich, State Representative Keele Johnson.
- Federal Agencies - U. S. Environmental Protection Agency, Region VIII; Agency for Toxic Substances and Disease Registry; U.S. Army Corps of Engineers; U.S. Forest Service; U.S. Bureau of Land Management; U.S. Nuclear Regulatory Commission; DOE.

- Environmental Organizations - The Nature Conservancy, Southern Utah Wilderness Alliance.
- Business Stakeholders - Energy Fuels Nuclear Inc., Envirocare.

IV. Community Concerns Regarding Disposal Alternatives

Stakeholders raised several concerns during the outreach activities conducted as described in Section I. These concerns included highway safety, potential ground-water contamination, health effects, project cost and progress, local economy, noise levels, water use, road damage, and future land use. Concerns are documented through public meeting transcripts, letters received by DOE, and notes from interviews with citizens. Some of this information is available in the Information Repository located in the Monticello Projects Office on 95 ½ South Main, Monticello, Utah. The rest of the information can be obtained by contacting Audrey Berry at the DOE Grand Junction Projects Office, P.O. Box 2567, Grand Junction Colorado, 81502.

1. **Highway Safety**
Highway safety is a major concern of the public, should the off-site truck haul disposal option be selected. Safety concerns focus particularly on the Devil's Canyon stretch of highway between Monticello and Blanding. Many citizens have expressed concern because of the high volume of traffic during tourist season and the large number of deer crossing the highway. There is concern for the safety of the children who attend the grade school in Blanding, use the Blanding swimming pool, and visit a snack shop that is near the highway. Concerns were also expressed on timing of truck shipments, the number and size of trucks, the proposed haul schedule, general spills, and the emergency plans in the event of a spill.
2. **Potential Ground-Water Contamination**
The White Mesa Utes and residents of Bluff have expressed great concern over the potential for contamination of ground water and their drinking water wells should the option for off-site disposal at the White Mesa Mill be selected. Monticello residents are concerned about the potential spread of ground-water contamination from the Monticello millsite. Continued interest in the method of achieving ground-water restoration is expected.
3. **Health Effects**
Past interviews with stakeholders and discussion in community involvement meetings indicated that many community members do not believe the tailings pose a serious health hazard; however, it appears that attitudes may be changing. With the recent publicity surrounding "human radiation experiments" conducted by the Department of Energy (then the Atomic Energy Commission) in the 1950s, fear about the danger posed by living near the tailings has increased. Although Monticello was not a site affected by such experiments, some citizens are concerned about past releases from the millsite to the environment and past worker exposure to hazardous materials. The community interviews conducted by the Agency for Toxic Substances and Disease Registry (ATSDR) for their public health assessment of the site have also increased general public awareness and concern regarding health issues. Health concerns raised during the ATSDR interviews have included past exposures related to the site, continuing exposure concerns, and health outcome concerns.

A health survey conducted in 1993 by the City of Monticello with help from local physicians determined that Monticello residents have experienced major health problems and increased cancer rates, presumably from living near the uranium mill. The study, and an accompanying request for

22.7 million dollars in compensation for the city of Monticello, was sent to the DOE in Washington, D.C. through U.S. Congressman Bill Orton.

4. Project Cost and Progress

The duration and cost of the project and perceived waste of taxpayer dollars is a community concern. The lengthy remediation of Clay Hill Drive, a residential road near the millsite that was termed "the million dollar highway" by a local citizen has contributed to the belief that the DOE is wasting money. Although the increased scope of work was required due to the need for removal of additional tailings along the road bed, public perception is that the work took too long to complete. Many residents also question the need for the number of supervisors on jobs who spend time observing one person do the work. A segment of the population firmly believes that the tailings are not a threat and that such a high level of cleanup is a waste of money. Citizens have also questioned the wisdom of buying the land for the on-site repository without using it.

5. Local Economy

Some citizens in Monticello believe that if the off-site disposal south of Blanding is selected, Monticello residents may lose out on jobs or other economic benefits, such as increased revenues from lodging, food, and services to project employees. The White Mesa Ute population would like to be selected for jobs at the White Mesa Mill.

The Monticello Economic/Tourism Development Council is concerned about the safety of tourists from the increased truck traffic should an off-site disposal option be selected. The council also believes that tourists may choose other routes through Cortez or Monument Valley to avoid truck traffic near Monticello. The Vice Chairman of the Council, who is a member of the Moab to Monument Valley Film Commission, is also concerned about the potential negative impact of a truck haul on development of the fledgling film industry in San Juan County.

Tourism and recreation could be affected by the off-site option in several ways. Widening portions of Highway 191 could delay tourist traffic in these areas during construction. Increased truck traffic could detract from the small-town atmosphere that attracts some tourists to southeastern Utah. The presence of signs on mill tailings haul trucks "for radioactive materials only" could make tourists feel uneasy about traveling in southeastern Utah.

6. Noise Levels

Blanding and Monticello residents who live near Highway 191 have expressed concern about increased noise levels and possible disruption of sleep if the truck haul option is selected.

7. Water Use

Blanding residents have voiced concern over potential water use at the White Mesa Mill. One resident was concerned that Energy Fuels would take water from Recapture Reservoir, and possibly cause shortages that would lead to watering restrictions for residential lawns. Monticello residents are also concerned about water use on the millsite.

8. Road Damage

Monticello and Blanding residents and city and county officials are concerned about road damage from project truck traffic on the Highway 191 transportation corridor through Blanding if an off-site option is selected. City and county officials are also concerned about who would pay for road

maintenance. Wear and tear on the roads both in and around Monticello caused by project traffic has been and continues to be a concern of municipal and county officials.

9. Future Land Use

Monticello officials are interested in what will happen to the site after remediation and in possible municipal uses for the land. Some officials do not support the stabilization on-site option because they want to allow for future expansion of the city both on and past the existing site. The San Juan County Commissioners are also concerned that using the land for a permanent on-site repository would result in loss of revenue because of the withdrawal from the tax roll and loss of water rights. The potential visual impacts of placing a disposal site where residents and tourists can see it is another concern.

10. Native American Concerns

The White Mesa Utes are concerned about the potential for ground-water contamination and subsequent contamination of their well water if the tailings are placed at the White Mesa Mill. The Westwater Navajos are also concerned about contamination and have echoed Ute concerns regarding odors from the White Mesa Mill and the potential effect of the tailings ponds on drinking water and wildlife.

Some Utes and Navajos have also stated that acceptance of tailings at the White Mesa Mill will defame the religious, historical heritage of Native Americans who believe the White Mesa Area is sacred land containing ancient burial grounds and ruins. The Native American People's Historical Foundation intends to build an archive, museum, and library north of the White Mesa Mill in an area that contains the ruin of a sacred Pueblo temple. They want the area to be unhampered by activity at the Mill.

The Utes are also concerned about pollution from the trucks and the safety of individuals walking along the highway. Navajos have expressed concern about the safety of children who cross the street to go to school in Blanding.

11. Site Specific Advisory Board Concerns

The SSAB has recommended moving the tailings to the White Mesa Mill, if specific conditions are implemented. These conditions include building an overpass south of Monticello; building a 3-lane highway at Devil's Canyon and leveling hills to a better grade; improving 100 East through Blanding for an emergency bypass; performing new construction on the road from Shirttail to White Mesa Mill; and setting aside money for highway resurface following project completion and for improving the community.

V. Constraints

1. Energy Fuels' NRC license amendment and renewal process for the White Mesa Mill Facility could take considerably longer to accomplish than the DOE originally anticipated. The NRC has now indicated that the license cannot be amended without the completion of an Environmental Assessment. This could delay the ability to haul tailings to the White Mesa Mill by 1½ years.
2. The availability of funding to support the remedial action alternative is subject to annual congressional approval.

3. Since DOE cannot legally fund training for local citizens who may not ever work on the project, other ways must be found to give local labor more opportunity to apply for jobs on the Monticello projects.
4. The ATSDR may set up a separate Citizen Advisory Board on health concerns related to the millsite. This could impact the credibility of the current Site Specific Advisory Board or set the boards up as "rivals."

VI. Strategy:

This strategy is to increase the opportunity for public involvement in decisions regarding disposal alternatives. It is also intended to establish two-way communication between the DOE and stakeholders, and ensure stakeholders have access to understandable, accurate, and timely information regarding the disposal alternatives and the Monticello projects. The following objectives and related activities respond to one or more of the issues or concerns raised during interviews, discussions, letters received from the public, and comments and questions from community involvement meetings. These activities were performed from June 1993 through August 1994.

Most individuals interviewed for the preparation of this Plan stated that they wished to be kept up to date through direct mailings or newspaper articles. Town meetings were generally not thought to be as effective as an event that would bring DOE into the community, such as the County Fair or Winterfest. Many citizens expressed support for establishment of the Site Specific Advisory Board to obtain community input on disposal alternatives and other project issues.

Effective use of the Site Specific Advisory Board for the Monticello Projects will be a primary focus of this strategy. The Board, which is made up of 16 members of the community, will help advise the DOE on decisions on disposal alternatives and future land use issues. Opportunities will be provided for education of the Board and general public on various topics of interest on the Monticello cleanup projects. Two-way communication and dialogue will be promoted through the Board, as well as participation in local gatherings such as the San Juan County Fair and Winterfest.

Fact Sheets will also be developed to provide clear and concise information on the projects. Personal contact through community interviews will be established, and interviews of citizens along the proposed haul route will be performed to ensure their concerns are heard. The Monticello Area office is permanently staffed, and the Remedial Action Manager and Project Manager will be available throughout the week, along with the Owner Relations representative, which will help facilitate more face-to-face communication.

Activities leading up to an Amendment to the Record of Decision will also be conducted in accordance with all applicable federal, state, and environmental laws. These activities include developing a Proposed Plan to Amend the Record of Decision, placing the Proposed Plan in the Administrative Record and Information Repository, publishing a Notice of Availability and brief description of the Proposed Plan in local newspapers, providing a 30- to 60-day public comment period on the Proposed Plan, holding public meetings in both Monticello and Blanding during the public comment period, preparing a Responsiveness Summary for inclusion in the ROD Amendment, placing the Amended ROD in the Administrative Record and Information Repositories, and publishing a Notice of Availability of the Amended ROD.

The strategy to address constraints includes increased communication in areas such as project schedule, funding, hiring practices, and health concerns. This would be performed through communications vehicles such as face-to-face meetings with local officials, direct mailing information updates, newspaper articles, and discussions in Site Specific Advisory Board meetings.

VII. Communications Objectives:

1. Communicate the ROD amendment process to interested and affected parties. Identify need for public involvement and show the public how they can become involved.
2. Provide opportunities to involve the public in decisions regarding the disposal alternatives.
3. Clarify risks associated with the following:
 - mill tailings, contaminated materials, and radiation in general.
 - ground-water contamination associated with the millsite.
 - highway safety risks and plans to mitigate those risks.
4. Keep citizens informed of project progress and provide opportunities for two-way communication regarding the project.

VIII. Communications Activities¹:

1. General Activities

- a. Provide updates on projects progress for mailing to key contacts and distribution at public meetings. Issue news releases on this information to the local media.

Concerns/Objectives addressed:

Periodic updates would address concerns related to perceived lack of progress. This activity would fulfill objective 4.

Project(s): Monticello Mill Tailings Site (MMTS), Monticello Vicinity Properties (MVP), Monticello Surface and Ground Water (MSG)

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: Twice a year; July and December 1994
Completed July 1994

- b. Organize a pictorial exhibit for use during public meetings and local gatherings such as the County Fair and Winterfest. The exhibit would identify areas for public involvement in decisions regarding the disposal options, show progress at the site, and include information on ground water and radiation.

¹ The timing of all communications activities will be reviewed for consistency with the *Site Management Plan*, once the Plan is issued in the fall of 1994.

Concerns/Objectives addressed:

The exhibit would help make technical information accessible and understandable. Information presented would address concerns on cost and perception of lack of progress, ground-water contamination, health effects, and future land use. This activity would fulfill objectives 3 and 4.

Project(s): MMTS, MVP, MSG

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: Completed; exhibited at County Fair August 11-13, 1994

- c. Maintain regular communication through routine monthly meetings/telephone calls with city officials from Blanding and Monticello and San Juan County Commissioners.

Concerns/Objectives addressed:

Regular communication would address concerns related to local employment and economy, future land use, water use, noise levels, road damage, cost, health effects, and ground-water contamination. This activity would fulfill all listed objectives.

Project(s): MMTS, MVP, MSG

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Mike Madson, Ron Owen

Timing: Monthly; Ongoing

- d. Develop fact sheets (5 total) on Operable Units I and II; Operable Unit III and groundwater; radiation; Monticello Vicinity Properties; and the role of ATSDR.

Concerns/Objectives addressed:

Fact sheets would address concerns on ground-water contamination, health effects, and cost. This activity would fulfill objectives 3 and 4.

Project(s): MMTS, MVP, MSG

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: September 1994 - February 1995

- e. Work with Utah Department of Transportation to find ways to improve highway safety.

Concerns/Objectives addressed:

Concerns of local officials and citizens regarding highway safety. This activity would fulfill objective 3.

Project(s): MMTS

Persons responsible: DOE - Audrey Berry
Geotech - Jim Cox

Timing: As appropriate

- f. Communicate information on highway safety improvements through regular meetings with the cities of Monticello and Blanding, and information updates.

Concerns/Objectives addressed:

Concerns of local officials and citizens regarding highway safety. This activity would fulfill objective 3.

Project(s): MMTS

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Jim Cox, Karen Scotti, Melissa Graham-Morris

Timing: As appropriate

- g. Contact residences, schools, and businesses along Highway 191 to provide information on the proposed truck haul and find out their concerns. Meet with individuals personally, as appropriate.

Concerns/Objectives addressed:

Talking with citizens that could be affected by the proposed truck haul could address all noted concerns, particularly those regarding highway safety, noise, local economy, and road damage. Better understanding of the truck haul could help alleviate citizen safety concerns that could delay implementation of the preferred alternative. This activity would fulfill objectives 1, 2, and 3.

Project(s): MMTS

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris, Gary Karriker

Timing: Completed

2. Site Specific Advisory Board Activities:

- a. Continue to participate in Site Specific Advisory Board meetings to provide a forum for regular contact between agencies and stakeholders, discussing citizen issues and concerns, and including citizens in decision-making.

Concerns/Objectives addressed:

The Board is currently focusing on highway safety and future land use concerns. The Board could potentially address all noted concerns and decide which ones it wanted to focus on and influence. This activity helps to fulfill all listed objectives.

Project(s): MMTS, MVP, MSG

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: Monthly or as scheduled by SSAB.

- b. Support the Board in identifying a specific task for board members, with SSAB recommendations to be submitted to DOE through a formal reporting mechanism.

Concerns/Objectives addressed:

The Board could potentially address all noted concerns and decide which ones it wanted to focus on and influence. This activity would fulfill all listed objectives.

Project(s): MMTS, MVP, MSG

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: Completed

- c. Provide general background educational modules to educate the Board and the public on topics of interest. These topics include: radiation (a general session on radiation, which would also help communicate risks associated with mill tailings and contaminated materials), and ground-water contamination on the millsite. Use assigned Monticello staff persons to teach these sessions, when possible. Publicize the sessions as open to the public by advertising in local newspapers.

Concerns/Objectives addressed:

The training workshops would address concerns on health effects and ground water. This activity would fulfill objective 3.

Project(s): MMTS, MVP, MSG

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris, Gary
Karriker, John Ware, Bill Merrill

Timing: As appropriate

- d. Assist SSAB in advertising meetings in local newspapers.

Project(s): MMTS, MVP, MSG

Persons responsible: DOE - Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: Ongoing

3. Potential ROD Amendment Activities²:

- a. Develop and produce a Proposed Plan to Amend the Record of Decision (ROD). Send the Proposed Plan to all stakeholders including residents in Monticello and Blanding via mass mailing.

Concerns/Objectives addressed:

The Proposed Plan would address concerns on future land use, highway safety, noise levels, ground-water contamination, health effects, and cost. This activity would fulfill objectives 1, 2, and 3.

Project(s): MMTS

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: December 1994

- b. Place the Proposed Plan to Amend the ROD in the Administrative Record and Information repository for access and comment by members of the public.

Concerns/Objectives addressed:

The Proposed Plan would address concerns on future land use, highway safety, noise levels, ground-water contamination, health effects, and cost. This activity would fulfill objectives 1 and 2.

Project(s): MMTS

Persons responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris,
Charles Pope

Timing: December 1994

- c. Publish a Notice of Availability and brief description of Proposed Plan to Amend the ROD in local newspapers to include the San Juan Record (Monticello) and the Blue Mountain Panorama (Blanding). Consideration should also be given to placing the notice in the Salt Lake City Tribune to assure all state agencies are aware of the availability of the document. Run notice in two editions. This notice will announce the public comment period, indicate the public meeting schedule, and announce that the Proposed Plan will be mailed to all residents and be available in the Administrative Record at the Monticello Area Office at 95 ½ South Main in Monticello, Utah.

² ROD Amendment Activities are based on the assumption that the *Proposed Plan to Amend the Record of Decision* will be issued by December 1994.

Project(s): MMTS

Concerns/Objectives addressed:

This activity would fulfill objectives 1 and 2.

Persons responsible:

DOE - Audrey Berry

Geotech - Karen Scotti, Melissa Graham-Morris

Timing:

December 1994

- d. Provide a 30-day public comment period on the Proposed Plan to Amend the ROD. This period may be extended to 60 days, upon timely request³.

Concerns/Objectives addressed:

This activity would fulfill objective 2.

Person(s) responsible:

DOE - Audrey Berry

Geotech - Karen Scotti, Melissa Graham-Morris

Timing:

January 1995

- e. Finalize agenda and content of briefings and conduct briefings for City and County officials to include the San Juan County Commissioners, the Monticello City Council, the Blanding City Council, and the Site-Specific Advisory Board. Dry run presentations.

Project(s): MMTS

Person(s) responsible:

DOE - Joel Berwick, Audrey Berry

Geotech - Karen Scotti, Melissa Graham-Morris

Timing:

As appropriate

- f. Produce visual aids in support of the public meetings to include charts comparing the disposal alternatives and information on ground-water protection.

Project(s): MMTS

Person(s) responsible:

DOE - Joel Berwick, Audrey Berry

Geotech - Karen Scotti, Melissa Graham-Morris

Timing:

As appropriate

- g. Schedule and conduct a public meeting in Monticello and a public meeting in Blanding during the public comment period. These meetings would provide information on the proposed ROD Amendment and the opportunity for formal public comment.

³ Dates listed are based on a 30-day public comment period.

Project(s): MMTS

Concerns/Objectives addressed:

This activity would fulfill objectives 1, 2, and 3.

Person(s) responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: January 1995

- h. Identify a primary community relations contact during Proposed Plan comment period.

Project(s): MMTS

Person(s) identified: DOE - Joel Berwick, Audrey Berry

Timing: Completed

- i. Maintain ongoing contact with interested elected officials, agency representatives, and other interested or affected parties.

Project(s): MMTS

Concerns/Objectives addressed:

This activity would fulfill all listed objectives.

Person(s) responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: Ongoing

- j. Prepare verbatim transcript of the public meeting. Place ad in local newspapers notifying public of its availability.

Project(s): MMTS

Concerns/Objectives addressed:

This activity would fulfill objective 2.

Person(s) responsible: DOE - Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: January 1995

- k. Prepare Responsiveness Summary for inclusion in the ROD Amendment.

Project(s): MMTS

Concerns/Objectives addressed:
This activity would fulfill objective 2.

Person(s) responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: January 1995

1. Place the Amended ROD in the Administrative Record and Information Repositories. The Administrative Record contains all documents required to support the ROD Amendment. Publish a Notice of Availability of the Amended ROD in the local newspapers. Mail copies of the notice to the key contacts mailing list and the SSAB.

Project(s): MMTS

Concerns/Objectives addressed:
This activity would fulfill objective 2.

Person(s) responsible: DOE - Joel Berwick, Audrey Berry
Geotech - Karen Scotti, Melissa Graham-Morris

Timing: As appropriate

Appendix A - Community Relations Activities and Regulatory Drivers

Activities	Requirement
1a. Updates on project progress	NCP §300.430(c)(2)(ii)(A-C); Standard practice per EPA guidance § 7.2.
1b. Pictorial exhibit	NCP §300.430(c)(2)(ii)(A-C); Standard practice per EPA guidance* § 7.2.1
1c. Maintain regular communications with city and county officials	NCP §300.430(c)(2)(ii)(A-C); Standard practice per EPA guidance § 7.2.1
1d. Develop fact sheets	NCP §300.430(c)(2)(ii)(A-C); Standard practice per EPA guidance § 7.2.1
1e. Work with UDOT on highway safety	Not applicable; good practice
1f. Regular meetings on safety improvements with cities; and information updates	NCP §300.430(c)(2)(ii)(A-C); Standard practice per EPA guidance § 7.2.1
1g. Contact residents along haul route to find out their concerns	NCP §300.430(c)(2)(ii)(A-C); and FFA 5/4/94 commitment.
2a - 2d. SSAB Advisory Board Meetings Support	DOE-Headquarters requirement/SSAB Charter
3a. Develop and Publish Proposed Plan	NCP §300.430 (c)(2)(ii)(B) & SARA 117 (a) and (d)
3b. Place the Proposed Plan in the Administrative Record	NCP §300.435(c)(2)(ii)(B), SARA §117
3c. Publish Notice of Availability	NCP §300.435(c)(2)(ii)(A)
3d. Provide a 30-day Public Comment Period	NCP §300.435 (c)(2)(ii)(C)

* U.S. Environmental Protection Agency, January 1994, *Community Relations in Superfund: A Handbook*

Activities	Requirement
3e. Pre-meeting briefing preparation support	NCP §300.430(c)(2)(ii)(A-C); Standard practice
3f. Visual aids to support public comment meeting	NCP §300.430(c)(2)(ii)(A-C); Standard practice
3g. Public Meeting	NCP §300.435.(c)(2)(ii)(B)-(F)
3h. Identify community relations contact for comments	NCP §300.415(m)(1); Standard practice per EPA guidance §4.1.2
3i. Maintain ongoing contact with interested parties.	Standard practice
3j. Prepare transcript of public meeting, place notice in local papers notifying public of its availability	NCP §300.435 (c)(2)(ii)(E-H)
3k. Prepare Responsiveness Summary	NCP §300.435.(c)(2)(ii)(F)
3l. Place Amended ROD in Administrative Record and Information Repository	NCP §300.435.(c)(2)(ii)(H)

Appendix B - Community Relations Activities Production Schedule¹

ACTIVITY	PRODUCTION COMPLETE
1a. Semi-Annual Progress updates to community	July December
1b. Pictorial Exhibit	Completed
1c. Monthly meetings, telephone briefings with city and county officials	Life of project
1d. Fact Sheets (5) - MMTS OU I & OU II - MMTS OU III & Ground Water - Vicinity Properties - Radiation - Role of ATSDR	February 1995
1e. UDOT Coordination	As appropriate
1f. Highway safety improvement briefings, information updates	As appropriate
1g. Community interviews along proposed haul route	Completed
2a. SSAB Meetings	Through life of project or until SSAB disbanded
2b. Support SSAB in identifying specific task and deliverable	Completed
2c. General background modules for SSAB and public - radiation - ground water	As appropriate
2d. Advertise SSAB meetings via press release	Ongoing for life of board
3a. Proposed Plan - production and mailing	December 1994

¹ Schedule is based on assumption that the *Proposed Plan to Amend the Record of Decision* will be issued by December 1994.

3b. Proposed Plan to Amend the ROD to Administrative Record	December 1994
3c. Notice of Availability Display Ads	December 1994
3d. 30-day public comment period	January 1995
3e. Briefings for Cities, County and SSAB	As appropriate
3f. Visual aids for public meetings	As appropriate
3g. Public Meetings	January 1995
3h. Primary Community Relations Contact	Established
3i. Ongoing contact with Stakeholders	Life of Project
3j. Transcript of public meetings	January 1995
3k. Responsiveness Summary	January 1995
3l. Notice of Availability of Amended ROD	As appropriate

Appendix C - Public Information

Information Contacts:

Joel Berwick, DOE Project Manager
Grand Junction Projects Office
P.O. Box 2567
Grand Junction, Colorado 81502
(303) 248-6007

Audrey Berry, DOE Public Relations
Grand Junction Projects Office
P.O. Box 2567
Grand Junction, Colorado 81502
(303) 248-7727

Paul Mushovic, Remedial Project Manager
U.S. EPA Region VIII
999 18th Street, Suite 500
Denver, Colorado 80202
(303) 294-1983

Mary Hagan, Community Relations
U.S. EPA Region VIII
999 18th Street
Denver, Colorado 80202
(303) 294-1116

Ty Howard, Project Manager
Environmental Response and Remediation
Utah Department of Environmental Quality
150 North 950 West, 2nd Floor
Salt Lake City, Utah 84116
(801) 536-4100

Diane Simmons, Community Relations
Utah Department of Environmental Quality
168 North 1950 West
Salt Lake City, Utah 84116
(801) 536-4480

Information Repository and Administrative Record :

Monticello Projects Office
Abajo Building, 95½ South Main
Monticello, Utah 84535
(801) 587-2615

U.S. Department of Energy
Grand Junction Projects Office
Technical Resource Center
2597 B½ Road
Grand Junction, Colorado 81503
(303) 248-6000

Appendix D: Mailing List of Key Contacts

A. Federal Elected Officials

U.S. Senators

U.S. Senator Orrin Hatch
United States Senate
135 Russell Senate Office Building
Washington, D.C. 20510
(202) 224-5251
(202) 224-6331 FAX

or

Karen Thorne, Director
Office of Senator Orrin G. Hatch
51 S. University Ave., Suite 320
Provo, UT 84606
(801) 375-7881
(801) 374-5005 FAX

Ron Madson, State Director
Office of Senator Orrin G. Hatch
51 S. University Ave., Suite 320
Provo, UT 84606
(801) 524-4380
(801) 524-4379 FAX

Robert Dibblee
Office of Senator Orrin Hatch
135 Russell Senate Office Building
Washington, D.C. 20510
(202) 224-5251
(202) 224-6331 FAX

U.S. Senator Robert F. Bennett
United States Senate
241 Senate Dirksen Office Building
Washington, D.C. 20515
(202) 224-5444
(202) 224-6717 FAX

or

Dixie L. Minson, State Director
Office of Senator Robert F. Bennett
4225 Federal Building, 125 South State
Salt Lake City, UT 84138
(801) 524-5933
(801) 524-5730 FAX

U.S. Congressman

Congressman Bill Orton
U.S. House of Representatives
1122 Longworth House Office Building
Washington, D.C. 20515-4403
(202) 225-7751

or

Niles T. Elwood, State Director
Office of Congressman Bill Orton
51 South University Ave., Suite 317
Provo, UT 84606
(801) 379-2500

B. State Elected Officials

Governor Michael O. Leavitt
State Capitol Building
Salt Lake City, UT 84114
(801) 538-1000
(801) 538-1527 FAX

State Senator Mike Dmitrich
Utah State Senate
319 State Capitol Building
Salt Lake City, UT 84114
(801) 636-2210
(801) 538-1414 FAX

State Representative Keele Johnson
Utah House of Representatives
318 State Capitol Building
Salt Lake City, UT 84114
(801) 538-1029 or
(801) 538-1908

C. Local Officials

City of Monticello
33 West 3rd South Street
Monticello, UT 84535
(801) 587-2271
(801) 587-2272 FAX

City Administrator: vacant 8/23/94

Monticello Planning Commission
Care Of City of Monticello
33 West 3rd South Street
Monticello, UT 84535
(801) 587-2271
(801) 587-2272 FAX

City of Blanding
50 West 100 South
Blanding, UT 84511
(801) 678-2791
(801) 678-3312 FAX
City Manager: Norman Johnson

D. County Officials

San Juan County Commission
117 South Main Street
Monticello, UT 84535
(801) 587-2231
(801) 587-2447 FAX

Mayor - The Honorable Jack Young
City Council: Craig R. Leavitt
Russell Schafer
John Black
Ms. Bernie Christensen
Dan Rogers

Shirley Christensen
Dianne Nielson
Dale Black
Dennis Davis
Carl Eisemann
Roger Low
Bernie Christensen (City Council
Member)

Mayor - The Honorable James K. Slavens
City Council: Wayne Palmer
Lou Mueller
Kim Acton
Mike Northern
Stan Perkins

County Commissioners -
J. Tyron Lewis, Chairman
Mark Maryboy
Bill Redd

E. State and Local Agencies

Kent Gray, Director
Div. of Environmental Response
& Remediation
168 N. 168 North 1950 West
Salt Lake City, UT 84116
(801) 536-4100
(801) 539-4242 FAX

Dianne Nielson, PhD, Executive Director
Utah Department of Environmental Quality
168 N. 1950 West
Salt Lake City, UT 84116
(801) 536-4400
(801) 536-4401 FAX

Brent Everett
Environmental Program Manager
Utah Department of Environmental Quality
168 N. 1950 West
Salt Lake City, UT 84116
(801) 536-4100
(801) 359-8853 FAX

Renette Anderson, Community Affairs
Utah Department of Environmental Quality
168 North 1950 West
Salt Lake City, UT 84116
(801) 538-6121
(801) 536-4401 FAX

Jim Adamson
Southeastern Utah District Health Dept.
Drawer E
Moab, UT 84532
(801) 259-5602

Susan Taylor, Economic/Tourism
Development
San Juan County
117 S. Main, PO Box 490
Monticello, UT 84535
(801) 587-3235
(801) 587-2425 FAX

Brad Johnson, Branch Manager, CERCLA
Div. of Environmental Response
& Remediation
168 N. 1950 West, Room 212
Salt Lake City, UT 84116
(801) 536-4100
(801) 539-4242 FAX

Bill Sinclair, Director Div. of Rad Control
Utah Dept. of Environmental Quality
168 N. 1950 West, Room 212
Salt Lake City, UT 84116
(801) 536-4250
(801) 533-4097 FAX

Ty Howard, Project Manager
Utah Dept. of Environmental Quality
168 N. 1950 West, 2nd Floor
Salt Lake City, UT 84116
(801) 536-4100
(801) 359-8853 FAX

Diane Simmons, Community Relations
Utah Dept. of Environmental Quality
168 North 1950 West
Salt Lake City, UT 84116
(801) 536-4480
(801) 536-4401 FAX

Gail Glover, Dean of Administrative &
Student Services
College of Eastern Utah San Juan Campus
639 West 100 South
Blanding, UT 84511
(801) 678-2201
(801) 678-2220 FAX

Dr. Lewis Kay Shumway
Dean of Instruction
College of Eastern Utah San Juan Campus
639 West 100 South
Blanding, UT 84511
(801) 678-2201
(801) 678-2220 FAX

F. U.S. Government Agencies/Remedial Action Contractor

William P. Yellowtail
Regional Administrator
U.S. EPA Region VIII
999 18th Street, Suite 500
Denver, CO 80202-2405
(303) 293-1616
(303) 294-7537 FAX

Paul Mushovic, Remedial Project Manager
U.S. EPA Region VIII
999 18th Street, Suite 500
Denver, CO 80202-2405
(303) 294-1983
(303) 294-7559 FAX

C. Jay Silvernale
U.S. EPA Region VIII
999 18th Street, Suite 500
Denver, CO 80202-2405
(303) 294-7079
(303) 294-7559 FAX

Ralph Lightner, Branch Chief
U.S. Department of Energy
Office of Environmental Restoration
Germantown, MD 20585
(301) 903-8180
(301) 903-8138 FAX

Ron Kowalewski, EM-451
Environmental Protection Specialist
Off-Site Division
U. S. Department of Energy
Office of Environmental Restoration
Germantown, MD 20585
(301) 903-7652
(301) 903-8550 FAX

Joel Berwick, Project Manager
U.S. Department of Energy
Grand Junction Projects Office
PO Box 2567
Grand Junction, CO 81502
(303) 248-6007
(303) 248-6023 FAX

Robert Duprey, Director
Waste Management Division
U.S. EPA Region VIII
999 18th Street, Suite 500
Denver, CO 80202-22405
(303) 294-1720
(303) 293-1724 FAX

Mary Hagan, Community Relations
U.S. EPA Region VIII (8OEA)
999 18th Street
Denver, CO 80202-2405
(303) 294-1116
(303) 294-7665 FAX

Mario Robles
U.S. EPA Region VIII (8HWM-FF)
999 18th Street, Suite 500
Denver, CO 80202-2405
(303) 294-1972
(303) 294-7559 FAX

Jake Gatrell, EM-451
U.S. Department of Energy
Office of Environmental Restoration
Germantown, MD 20585
(301) 903-7221
(301) 903-8550 FAX

Audrey Berry, Public Affairs
U.S. Department of Energy
Grand Junction Projects Office
PO Box 2567
Grand Junction, CO 81502
(303) 248-7727
(303) 248-6023 FAX

Marjorie G. Gallagher
Environmental Engineer
Agency for Toxic Substances
& Disease Registry
Executive Park, Building 33
1600 Clifton Road, E-56
Atlanta, GA 30333
(404) 639-6040
(404) 639-6075 FAX

Ms. Jody Lally
Boston University School of Public Health
Department of Environmental Health
Talbot 3C
80 East Concord Street
Boston, MA 02119
(617) 638-4620
(617) 638-4857 FAX

James F. Archibald
Vice President of Operations
RUST Geotech Inc.
PO Box 14000
Grand Junction, CO 81502
(303) 248-7615
(303) 248-6040 FAX

Karen S. Scotti
Public Relations Director
RUST Geotech Inc.
PO Box 14000
Grand Junction, CO 81502
(303) 248-6403
(303) 248-6040 FAX

Don Burchett, Chief of Real Estate
U.S. Army Corps of Engineers
PO Box 2288
Mobile, AL 36652
(205) 694-3650

Michael E. Madson
Director of Remedial Operations
RUST Geotech Inc.
PO Box 14000
Grand Junction, CO 81502
(303) 248-6026
(303) 248-6040 FAX

Ron Owen, Monticello Area Manager
RUST Geotech Inc.
PO Box 909
Monticello, UT 84535
(801) 587-2615
(801) 587-2672 FAX

Melissa Graham-Morris
Sr. Community Relations Specialist
RUST Geotech Inc.
PO Box 14000
Grand Junction, CO 81502
(303) 248-6141
(303) 248-6040 FAX

G. Environmental, Conservation, and Ecological Organizations

Joel Tuhy
Colorado Plateau Public Lands Director
The Nature Conservancy
Moab Project Office
PO Box 1329
Moab, UT 84532-1329
(801) 259-4629
(801) 259-2677 FAX

Scott Groene
Southern Utah Wilderness Alliance
PO Box 758
76 S Main #4
Moab, UT 84532
(801) 259-5440
No fax

Mr. Ben Morris
Habitat Biologist
Department of Natural Resources
Division of Wildlife Resources
455 West Railroad Avenue
Price, UT 8450-2629
(801) 637-3310
(801) 637-7361 FAX

H. Site-Specific Advisory Board

Bruce Adams

[REDACTED]
Monticello, UT 84535
[REDACTED]
[REDACTED]

Darroll P. Young

[REDACTED]
Monticello, UT 84535
[REDACTED]

Trent Schafer

[REDACTED]
Monticello, UT 84535
[REDACTED]
[REDACTED]

Nick Sandberg

[REDACTED]
Monticello, UT 84535
[REDACTED]
[REDACTED]

Wayne Palmer

[REDACTED]
Blanding, UT 84511
[REDACTED]

John K. Black

[REDACTED]
Monticello, UT 84535
[REDACTED]
[REDACTED]

Maryleen Tahy

[REDACTED]
Blanding, UT 84511
[REDACTED]

C. Alfred Frost

[REDACTED]
Monticello, UT 84535
[REDACTED]

Elaine Cantsee

[REDACTED]
Blanding, UT 8451135
[REDACTED]

Robert E. Hosler

[REDACTED]
Blanding, UT 84511
[REDACTED]
[REDACTED]

Cleal Bradford

[REDACTED]
Blanding, UT 84511
[REDACTED]
[REDACTED]

William G. Dunow, Jr.

[REDACTED]
Monticello, UT 84535
[REDACTED]

Dale Slade

Blanding, UT 84511

Norman L. Johnson

Blanding, UT 84511

Ted Royer

Blanding, UT 84511

Susan Taylor

San Juan County Economic/Tourism Dev.

P. O. Box 490

Monticello, UT 84535

801-587-3235 work

I. Media

Joyce Martin & Ingrid Adams, Publishers

San Juan Record

937 E. Highway 666

P. O. Box 879

Monticello, UT 84535

(801) 587-2277

(801) 587-2421 FAX

Neil and Becky Joslin, Publishers

Blue Mountain Panorama

329 West 400 North

Blanding, UT 84511

(801) 678-3635

(801) 678-2262 FAX

Phil Mueller

KUTA Radio

North Highway 191

Blanding, UT 84511

(801) 678-2261

(801) 678-2262 FAX

Tom Arviso, Jr. Managing Editor

Navajo Times

PO Box 310

Window Rock, AZ 86515-0310

Phil Hall, Editorial Board

Canyon Echo

PO Box 410

Bluff, UT 84512

(801) 672-2202

J. Administrative Record/Information Repositories

Administrative Record

RUST Geotech, Inc.
Monticello Area Office
95 ½ South Main
Monticello, UT 84535
(801) 587-2615
(801) 587-2672 FAX

Information Repository

U.S. Department of Energy
Grand Junction Projects Office
Technical Resource Center
2597 B ¾ Road
Grand Junction, CO 81503
(303) 248-6000
(303) 248-6040 FAX

K. Business Stakeholders

Energy Fuels Nuclear, Inc.
2564 Compass Drive
Suite 101
Grand Junction, CO 81506
(303) 243-1968
(303) 243-1973

Envirocare of Utah, Inc.
46 West Broadway
Suite 240
Salt Lake City, UT 84101
(801) 532-1330